

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

IN RE:	§	
	§	
ERIC RALLS,	§	CASE NO. 24-60504
	§	
Debtor	§	Chapter 7
	§	

**LIMITED OBJECTION OF CHAPTER 7 TRUSTEE TO PLANTSAP INC.'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Now Comes, Areya Holder Aurzada, in her capacity as duly appointed Chapter 7 Trustee (the “**Trustee**”) of the above-referenced bankruptcy estate, files this limited objection (the “**Limited Objection**”) to “PlantSnap Inc.’s *Motion for Relief from the Automatic Stay to Exercise Voting and Other Rights with Respect to the DEM Shares and For Related Relief*” [Docket. No. 80] (the “**Motion**”), and respectfully states as follows:

1. The Trustee does not at this time take a position either in support of or in opposition to the relief requested by PlantSnap Inc. (“**PlantSnap**”) in the Motion. The Trustee files this Limited Objection to preserve her rights and those of the estate pending additional investigation and discovery.

2. The Trustee acknowledges PlantSnap’s assertion of its security interest in the DEM Shares and its request for relief from the automatic stay to exercise voting and other rights with regard to those shares. However, the Trustee lacks sufficient information at this time to fully evaluate or respond to the factual allegations and legal arguments made in the Motion—including, but not limited to, the precise nature, extent, and validity of PlantSnap’s rights; the status and location of the DEM Shares; and the current value and operations of the relevant entities.

3. To date, the Trustee's efforts to investigate the property of the estate and issues relating to the DEM Shares have been hampered by the inability to conduct a Rule 2004 examination of the Debtor. An examination of the Debtor was originally scheduled for July 11, 2025, and then rescheduled for July 21, 2025; both by court order [Dockets no. 72 & 75]. On both occasions, the examination was cancelled by the Debtor due to medical reasons.

4. The Trustee intends to reschedule the Debtor's examination at the earliest available opportunity and to pursue other discovery avenues as necessary to fulfill her duties under the Bankruptcy Code.

5. Until the Trustee is able to obtain and review additional information, including the opportunity to examine the Debtor, she is unable to take a definitive position with respect to the Motion or the relief requested by PlantSnap.

6. Accordingly, the Trustee respectfully requests that (a) the Court defer ruling on the Motion until the Trustee has had a reasonable opportunity to complete her investigation, including the Debtor's examination, or (b) any order entered with respect to the Motion be expressly without prejudice to the Trustee's rights to seek further relief as appropriate after additional information is obtained.

RESERVATION OF RIGHTS The Trustee expressly reserves all rights, claims, defenses, and remedies with respect to the Motion, the DEM Shares, and any issues related thereto.

WHEREFORE, the Trustee respectfully requests that the Court consider the foregoing, defer or reserve ruling on the Motion as set forth above, and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

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By: /s/ John Paul Stanford
John Paul Stanford
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ATTORNEYS FOR TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on August 1, 2025, upon the Debtor, Debtor's counsel and all parties receiving electronic notice.

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